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December 23, 2008

Honorable Richard J. Sullivan
United States District Judge
Southern District of New York
500 Pearl Street, Room 615
New York, New York 10007

Via E-Mail sullivannysdchambers@nysd.uscourts.gov

Re: United States v. The Painting Known as "Hannibal," by Jean Michel
Basquiat, et al., Civil Docket No. 1:08-cv-01511-RJS

Dear Judge Sullivan:

The undersigned's law firm, Ferrell Law, P.A., represents Vânio Cesar Pickler Aguiar, as Trustee for the Estate of Banco Santos, S.A.

Pursuant to Rule G(5)(a)(ii) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions and the Court's Individual Rules of Practice, the purpose of this letter is to respectfully request an extension of time to and until January 22, 2009 for the Trustee to file his verified claim in this forfeiture action on behalf of the Estate of Banco Santos, S.A.

Banco Santos, S.A., is a Brazilian bank currently in bankruptcy proceedings in that country. It has suffered losses in excess of \$1 billion as a result of a fraud and money laundering scheme committed by its former President Edemar Cid Ferreira. Mr. Aguiar is the court-appointed trustee for the bank's estate.

Ferrell Law, P.A., along with the law firm of William L. Richey, P.A., have been recently retained by the Trustee to recover assets stolen from Banco Santos. Last week their investigators traveled to Brazil, reviewed records and determined that some of the proceeds stolen from the bank were used to purchase the artwork that is the subject of this forfeiture action.

Presently, the deadline to file a claim in this action is today, December 23, 2008, the Government having first published its Notice of Civil Forfeiture on the official government website (www.forfeiture.gov) on October 24, 2008. Counsel did not become aware of that publication until examining the Court's docket earlier today and, as a result, counsel is immediately submitting this letter requesting an extension of time.

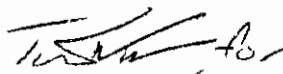
Honorable Richard J. Sullivan
December 23, 2008
Page 2

A thirty (30) day extension of time is requested in order to permit counsel to continue its investigation and submit a verified notice of claim fully setting forth the basis for the Trustee's claim.

On December 23, 2008, attorney H. Eugene Lindsey of Ferrell Law, P.A. spoke with Assistant United States Attorney Amy Lester who advised that Assistant United States Attorney Sharon E. Frase, counsel for the Government, agrees to this request for an extension of time.

Respectfully submitted,

Ferrell Law, P.A.



Neil Postrygacz

NP/hel

cc: Sharon E. Frase, AUSA
Karl Harold Buch, Esq.
Thomas Edward Butler, Esq.
Jeffery Patrick Becherer, Esq.
Daniel James Horwitz, Esq.
Christopher Thomas Leonardo, Esq.

*Request granted. Any
claim must be filed by
January 22, 2009.*

SO ORDERED

DATE: 12/24/08

RICHARD J. SULLIVAN

U.S.D.J.

